

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION

UNITED STATES DEPARTMENT OF  
DEFENSE, et al.,

*Plaintiffs,*

V.

Case No. 6:25-cv-00119-ADA

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, AFL-CIO,  
DISTRICT 10, et al.,

*Defendants.*

**DECLARATION OF JACKSON WHEELER IN SUPPORT OF  
MOTION TO DISMISS**

I, Jackson Wheeler, declare as follows:

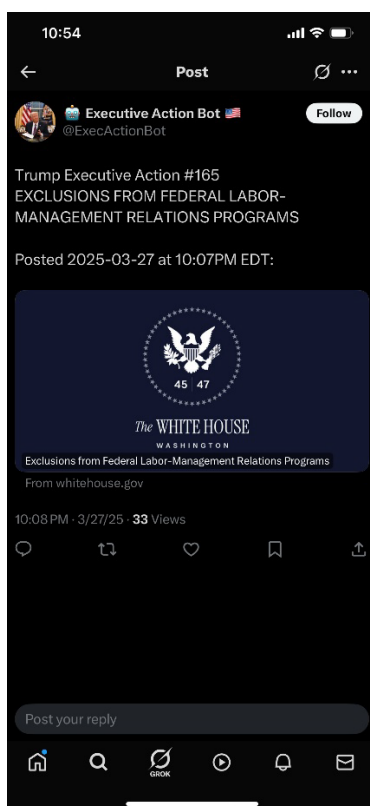
1. I am over 18 years of age and competent to give this declaration. This declaration is based on my personal knowledge, information, and belief.
2. I am the Paralegal Manager at Bredhoff & Kaiser, PLLC.
3. On April 8, 2025, I was given the task of verifying the time that the March 27, 2025, Executive Order titled “Exclusions from Federal Labor Management Relations Programs” was published on the White House website.
4. The first step I took was to check the publicly accessible source code at the following URL: <https://www.whitehouse.gov/presidential-actions/2025/03/exclusions-from-federal-labor-management-relations-programs/>.
5. The screenshot below is a true and accurate copy of a portion of that source code, which I downloaded to a file at 2:30 PM EDT on April 8, 2025. It shows that the Executive Order was published at 2:07 AM UTC on March 28, 2025, which is 10:07 PM EDT on March 27, 2025.

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<meta name="description" content="By the authority vested in me as President by the Constitution and the laws of the United States of America, inc:
<link rel="canonical" href="https://www.whitehouse.gov/presidential-actions/2025/03/exclusions-from-federal-labor-management-relations-programs/" ,
<meta property="og:locale" content="en_US" />
<meta property="og:type" content="article" />
<meta property="og:title" content="Exclusions from Federal Labor-Management Relations Programs" />
<meta property="og:description" content="By the authority vested in me as President by the Constitution and the laws of the United States of Ameri
<meta property="og:url" content="https://www.whitehouse.gov/presidential-actions/2025/03/exclusions-from-federal-labor-management-relations-prograr
<meta property="og:site_name" content="The White House" />
<meta property="article:publisher" content="https://www.facebook.com/WhiteHouse/" />
<meta property="article:published_time" content="2025-03-28T02:07:43+00:00" />
<meta property="article:modified_time" content="2025-03-28T02:07:44+00:00" />
<meta property="og:image" content="https://www.whitehouse.gov/wp-content/uploads/2025/03/WH47-Presidential-Actions-Social-Share-Card.jpg" />
<meta property="og:image:width" content="1200" />
<meta property="og:image:height" content="628" />
<meta property="og:image:type" content="image/jpeg" />
<meta name="twitter:card" content="summary_large_image" />
<meta name="twitter:creator" content="@whitehouse" />
<meta name="twitter:site" content="@whitehouse" />
<script type="application/ld+json">{"@context":"https://schema.org", "@graph":[{"@type":"Article", "@id":"https://www.whitehouse.gov/presidential-act

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6. To confirm that finding, I did a search on X.com for the title of the Executive Order. That search showed that the earliest post about the Executive Order was at the same time, down to the minute: 10:07 PM on March 27, 2025. One of the earliest posts about the Executive Order was the following, which includes a timestamp verifying that the Executive Order was posted at 10:07 PM.




7. Based on the above, I am confident that the Executive Order was first published on the White House website at 10:07 PM EDT on March 27, 2025.

8. The screenshot below is a true and correct excerpt from the PACER-generated Docket Activity Report for this case. It shows that the Complaint was docketed by Emily Hall at 7:24 PM CDT on March 27, 2025, or 8:24 PM EDT.

Case Number/Title	Dates	Category/Event	Docketed by	Notes
<a href="#">6:25-cv-00119-ADA United States Department of Defense et al v. American Federation of Government Employees, AFL-CIO, District 10 et al</a>	Entered: 03/27/2025 19:24:33 Filed: 03/27/2025	Category: cmp Event: Complaint Document: <a href="#">1</a>	E. Hall Type: aty	Cause: 28:2201 Declaratory Judgment NOS: Labor: Labor/Mgt. Relations Office: Waco Presider: Alan D Albright Jury demand: None
	COMPLAINT ( Filing fee \$ 405 receipt number ATXWDC-19971575). No Summons requested at this time, filed by United States Social Security Administration, United States Department of Agriculture, United States Department of Defense, United States Department of Justice, United States Environmental Protection Agency, United States Department of Veterans Affairs, United States Department of Homeland Security, United States Department of Housing and Urban Development. (Attachments: # <a href="#">1</a> Civil Cover Sheet)(Hall, Emily)			

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Date: April 20, 2025

  
Jackson Wheeler